

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

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In re: : Chapter 11  
:   
BIG LOTS, INC., *et al.*,<sup>1</sup> : Case No: 24-11967 (JKS)  
:   
Debtors. : (Jointly Administered)  
:   
: **Re: Docket No. 16, 124 & 134**  
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**LIMITED OBJECTION AND RESERVATION OF RIGHTS OF LANDLORD  
COLUMBIA PARK RETAIL OWNER, LLC TO INTERIM ORDER (I) AUTHORIZING  
DEBTORS TO ASSUME THE CONSULTING AGREEMENT, (II) AUTHORIZING  
STORE CLOSING SALES AND APPROVING RELATED PROCEDURES, AND (III)  
GRANTING RELATED RELIEF**

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Columbia Park Retail Owner, LLC, as successor-in-interest to FC/TREECO Columbia Park, LLC c/o Madison International Realty as the landlord (“Landlord”) of Store No. 5323 located at 3129 Kennedy Blvd, North Bergen, New Jersey 07047 (the “Premises”) under lease (the “Lease”) with the above-captioned Debtor, by and through its undersigned counsel, files this limited objection and reservation of rights to the *Motion for Entry of Final Order (I) Authorizing Debtors to Assume the Services Agreement, (II) Authorizing Store Closing Sales and Approving Related Procedures, and (III) Granting Related Relief* [Doc 16] (the “Motion”) and in response to the Interim Order [Doc 134],<sup>2</sup> and in support thereof states as follows.

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. DublinGranville Road, Columbus, OH 43081.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion and Interim Order.

Landlord's Lease and Premises are subject to the Store Closing Sales and the Store Closing Procedures. See Store No. 5323 listed under the Interim Order. Currently, the cure amount owed under the Lease totals no less than approximately \$100,000.00, comprised of two months of rent at the monthly rate of \$44,212.00 plus additional rent under the Lease. Landlord asserts that all post-petition rent under the Lease must remain current and deadline no later than December 1, 2024 must be fixed to conclude Store Closing Sales. The continuation of Store Closing Sales and display of such signs in the Premises is contrary to the Lease and risks diminishing the value of the Premises. Landlord reserves all rights to amend or supplement this objection as well as any additional grounds for objection to the proposed assumption and assignment.

Dated: Wilmington, Delaware  
October 2, 2024

/s/ Michael J. Joyce  
Michael J. Joyce (No. 4563)  
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*Counsel to Columbia Park Retail Owner, LLC, as successor-  
in-interest to FC/TREECO Columbia Park, LLC c/o  
Madison International Realty as the landlord*